

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

October 13, 2021

*Sent via email*

Mike Samples  
de maximis, Inc.  
450 Montbrook Lane  
Knoxville, TN 37919

Re: Agency comments on RA workplan

Dear Mike:

**General Comments**

Please update this RAWP in accordance with the comments listed below and Agency comments on the 95% RD report.

The air monitoring and dust control plan should also include plans for perimeter air monitoring and odor management that address potential off-site impacts during RA construction for both particulates and organic constituents.

The SOW requires that the RAWP include the following: description of plan for satisfaction of permitting requirements including obtaining permits for offsite disposal activity and for satisfying substantive requirements of permits for onsite activity ; summary of spill control plan or other plans to eliminate or reduce incidence of emissions during construction, and to minimize the impacts of such potential releases to adjacent environments. Please update the RAWP to include these SOW requirements.

**Valleycrest Drive redesign.** The final design for the road construction should be contained within the RAWP to allow for proper review and approval by City engineers. The 95% RD states that conventional boring techniques can be used to install piping under the road. What impacts to final construction of the remedy cap can be anticipated, including any perimeter stormwater drainage infrastructure and cap key in requirements?

## Specific Comments

1. Page 4-1 Section 4.2. RA contractor will be selected by the SWP and approved by the EPA (paragraph 9.c of Site CD).
2. Page 4-3 par 1. Sediment and erosion control features will be inspected regularly during construction and immediately after storm events. Repairs may require immediate attention-please modify the text.
3. Page 4-4 bullets. Final disposition of chipped vegetative material will require Agency approval. Extensive use as fill will not be acceptable. Any use for fill material must include a demonstration that materials will not negatively impact the installed remedy, including any potential for settlement/consolidation.
4. Page 4-6 Section 4.6. As required by Agency comments on the RD, appropriate confirmation sampling will be required for all excavation areas.
5. Page 4-7 Section 4.7 par 2. All imported soil materials must meet Ohio Voluntary Action Program (VAP) Table I Residential Generic Direct Contact Soil Standards. Please modify text to include a plan for sampling of all imported soils.
6. Page 4-9 Section 4.11. EPA approval is required for all well abandonment.
7. Page 4-9 Section 4.12. EPA approval is required for all well abandonment. This plan should also include steps to verify the depth of these wells so that the plan can fully document closure in accordance with State requirements.
8. Page 4-10 Section 4.14. The SOW (Section 4.7.C) requires that this report be completed in accordance with Chapter 2 of EPA's closeout procedures for NPL sites guidance and is accompanied by all certifications required by paragraph 6.5 of the SOW. Please update.
9. Page 5-1. Please provide a figure for these roles. EPA approval is required for the RA contractor and the CQA consultant. Please also include details on when this section will be updated by the RA contractor.
10. Page 7-1 Section 7.1. The first sentence is unclear-please correct.
11. Page 7-1 Section 7.2. EPA must approve of any off-site disposal-please update text.
12. Page 8-2 Section 8.3-8.6. The location of site access roads should be included in the final RD—this can be modified on as-built drawings if locations change. Please see comment on 95% design for installation of an access road around the stormwater pond. The RA

contractor will be responsible for the location of haul routes and parking and staging areas—how will this information be communicated to the Agencies?

13. Page 8-3 Section 8.6. Signage requirements for the perimeter fence should be included.
14. Page 11-1 Section 11. When will the SPCC plan be provided to the Agencies? Please update the text.
15. Page 12-1 Section 12. Please update this section with the results of the interim LFG study currently underway.
16. Page 13-1 Section 13. Why can't this schedule be more forward oriented so that more work can be completed in 2022? You indicated that the Settling Defendants want the RA contractor to make these decisions, but the bid advertisement can indicate that certain work be completed sooner. This avoids a significant amount of downtime in fall 2022, while waiting for the initiation of cap construction.

Please let me know if you have any questions regarding these comments. The final RAWP is due within 30 days of receipt of this letter.

Sincerely yours,

*Dion Novak*

Dion Novak  
Remedial Project Manager

cc: S. Glum, OEPA  
B. Martin, Toeroek